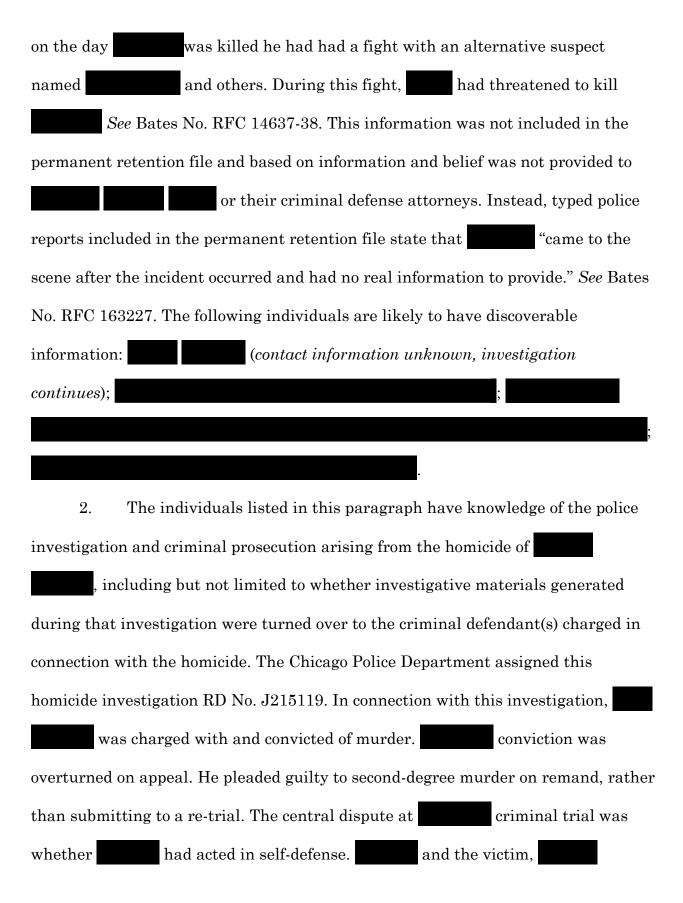
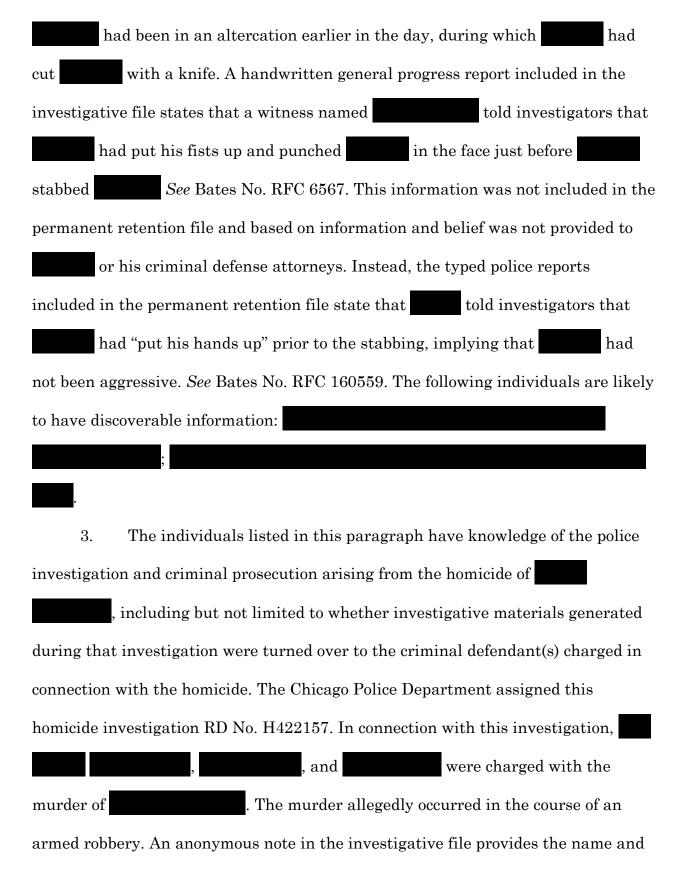
## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

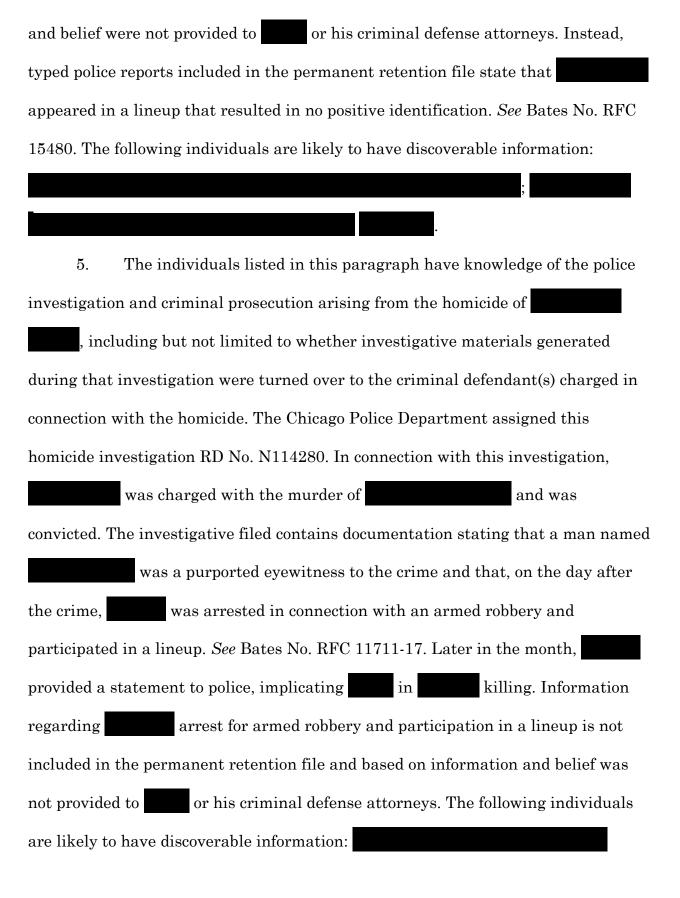
JACQUES RIVERA,  Plaintiff,  v.  REYNALDO GUEVARA, et al.,  Defendants.	) Case No. 12 C 4428 ) Hon. Joan B. Gottschall, ) District Judge ) Hon. Mary M. Rowland, ) Magistrate Judge )
	ENTAL RULE 26(A)(1) DISCLOSURES is attorneys, pursuant to the Court's
Orders of June 12, 2015, Doc. No. 202, Se	eptember 2, 2015, Doc. No. 206, and
October 13, 2015, Doc. No. 210, hereby su	ubmits the following supplemental
disclosures pursuant to Federal Rule of C	Civil Procedure 26(a)(1):
The following individuals are likely	y to have discoverable information that
Plaintiff may use to support his claims:	

1. The individuals listed in this paragraph have knowledge of the police investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection with the homicide. The Chicago Police Department assigned this homicide investigation RD No. P128067. In connection with this investigation, and were charged with the murder of Records of a police interview with witness reveals that



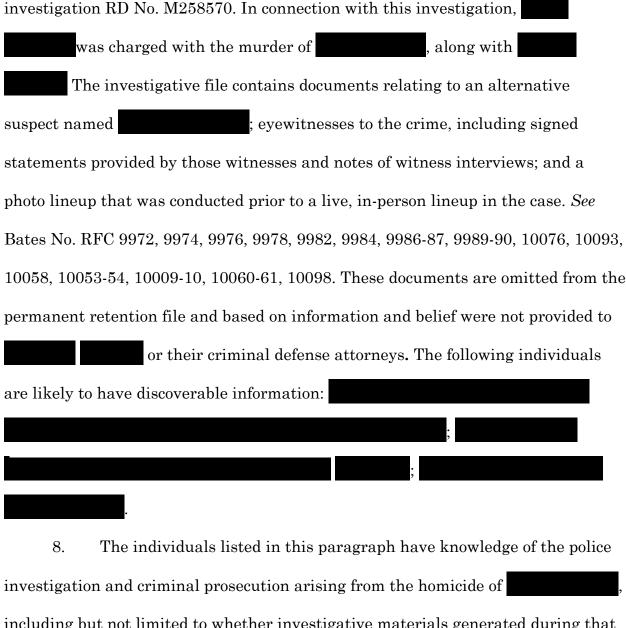


4. The individuals listed in this paragraph have knowledge of the police investigation and criminal prosecution arising from the homicide of police, including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection with the homicide. The Chicago Police Department assigned this homicide investigation RD No. P272087. In connection with this investigation, was charged with the murder of pand and was convicted on June 12, 1991. The investigative file contains documentation of an in-person lineup, in which a witness positively identified an alternative suspect named po



6. The individuals listed in this paragraph have knowledge of the police
investigation and criminal prosecution arising from the homicide of
and , in what appeared to be a gang-related shooting, including but
not limited to whether investigative materials generated during that investigation
were turned over to the criminal defendant(s) charged in connection with the
homicide. The Chicago Police Department assigned this homicide investigation RD
No. M184949. In connection with this investigation,
with the murder of and and was convicted. The investigative file
contains handwritten notes discussing an alternative suspect named
, as well as notes describing the offender's car and eyewitness accounts of the
offense. See Bates No. RFC 9669, 9671, 9698-9702, 9704-9713, and 9720. These
notes are omitted from the permanent retention file and based on information and
belief were not provided to or his criminal defense attorneys. The following
individuals are likely to have discoverable information:
;

7. The individuals listed in this paragraph have knowledge of the police investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection with the homicide. The Chicago Police Department assigned this homicide



investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection with the homicide. The Chicago Police Department assigned this homicide investigation RD No. M381429. In connection with this investigation, was charged with the murder of and was convicted.

was beaten to death during an armed robbery. The investigative file contains police

had been mugged twice in August 1989 and that she died from injuries suffered during the second of those two muggings. In addition, reports in the investigative file state that could not see or identify the offender involved in the first of the two muggings and that the first incident was not serious, such that refused medical treatment. See Bates No. RFC 10273, 10283-85, and 10251-57. These reports are omitted from the permanent retention file and based on information and belief were not provided to or his criminal defense attorneys. was convicted of murder based on a confession that he had been involved in a purse snatching involving The following individuals are likely to have discoverable information:

9. The individuals listed in this paragraph have knowledge of the police investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection with the homicide. The Chicago Police Department assigned this homicide investigation RD No. M127008. In connection with this investigation, was charged with the murder of and was convicted. was shot in a gang shooting and died about 14 years later. was initially convicted of aggravated battery and later tried and convicted of murder. The investigative file contains Supplemental Reports that include a

investigation and criminal prosecution arising from the homicide of investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection with the homicide. The Chicago Police Department assigned this homicide investigation RD No. M558552. In connection with this investigation, was charged with the murder of and was convicted.

was shot in liquor store robbery. The case was a "cold case" for three years, until the defendant supposedly admitted his participation in the crime. The investigative file contains a handwritten note instructing someone to bring a blue

knit hat for the lineup See Bates No. RFC 10701. The offender had worn a similar

hat, and Mr. reports that he was made to wear this hat at the lineup, years
after the crime. The investigative file also reveals an undisclosed alternate suspect,
. See Bates No. RFC 10663-64. Additionally, the investigative file
reveals that the detectives pulled defendant's other arrest documents, suggesting
detectives worked backwards. See Bates No. RFC 10682, 10710-11. The following
individuals are likely to have discoverable information:
and
11. The individuals listed in this paragraph have knowledge of the police
11. The individuals listed in this paragraph have knowledge of the police investigation and criminal prosecution arising from the homicide of
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investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that
investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection
investigation and criminal prosecution arising from the homicide of including but not limited to whether investigative materials generated during that investigation were turned over to the criminal defendant(s) charged in connection with the homicide. The Chicago Police Department assigned this homicide

Information in the investigative file, but not in the permanent retention file, included supplementary reports detailing: the eyewitnesses identities and interview notes; the evidence, arrest, recovery of property, motives, and car used during the offense; the defendants' statements; witness descriptions of the offenders; the location of the offense; the motive; an account of the crime; property and evidence

taken, canvas results; a description of the handgun used in the offense and found on the scene; notes about eyewitness interviews detailing descriptions of the offenders; a report of the arrest; description of witness identifications and a report of the lineup; a report of the recovery of the stolen property; and details about the course of the investigation. See Bates No. RFC 13676-81,13685-96, 13727-40. The following individuals are likely to have discoverable information:

These disclosures are intended to supplement Plaintiff's prior disclosures. In addition, Plaintiff reserves the right to supplement these disclosures as additional information comes to light.

## RESPECTFULLY SUBMITTED,

/s/ Anand Swaminathan
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## **CERTIFICATE OF SERVICE**

I, Anand Swaminathan, an attorney, hereby certify that on October 23, 2015, I filed the foregoing Plaintiff's Second Supplemental Rule 26(a)(1) Disclosures using the Court's CM/ECF system, which effected service on all counsel of record listed below.

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